

CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.

COUNSELLORS AT LAW

CHARLES C. CARELLA
BRENDAN T. BYRNE
JAN ALAN BRODY
JOHN M. AGNELLO
CHARLES M. CARELLA
JAMES E. CECCHI

JAMES D. CECCHI (1933-1995)
JOHN G. GILFILLAN III (1936-2008)
ELLIOT M. OLSTEIN (1939-2014)

JAMES T. BYERS
DONALD F. MICELI
A. RICHARD ROSS
CARL R. WOODWARD, III
MELISSA E. FLAX
DAVID G. GILFILLAN
G. GLENNON TROUBLEFIELD

BRIAN H. FENLON
LINDSEY H. TAYLOR
CAROLINE F. BARTLETT

**5 BECKER FARM ROAD
ROSELAND, N.J. 07068-1739
PHONE (973) 994-1700
FAX (973) 994-1744
www.carellabyrne.com**

September 4, 2019

PETER G. STEWART
FRANCIS C. HAND
AVRAM S. EULE
CHRISTOPHER H. WESTRICK*
JAMES A. O'BRIEN III**

OF COUNSEL

*CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY
**MEMBER NY AND MA BARS ONLY

RAYMOND J. LILLIE
WILLIAM SQUIRE
STEPHEN R. DANEK
DONALD A. ECKLUND
MEGAN A. NATALE
ZACHARY S. BOWER+
MICHAEL CROSS
CHRISTOPHER J. BUGGY
JOHN V. KELLY III
MICHAEL A. INNES

+MEMBER FL BAR ONLY

VIA ECF

Hon. Madeline Cox Arleo
United States District Judge
Martin Luther King Federal Building
50 Walnut Street
Newark, New Jersey 07102

Re: In re American Medical Collection Agency, Inc. Customer Data Security Breach Litigation
Civil Action No. 19-md-2904(MCA)(MAH)

Dear Judge Arleo:

As Your Honor is aware, I am interim lead counsel for Plaintiffs. In accordance with the Court's Initial Case Management Order (Docket Entry 9), I am working to develop a proposal to submit to the Court regarding the initial organization of Plaintiffs' counsel. While I am confident that we will present an inclusive and efficient structure, it is not possible in a large case such as this to include each and every qualified counsel in the proposal. As such, in order to insure that all qualified counsel have an opportunity to advocate on his or her behalf, I believe that any lawyer who seeks a leadership position, and is not included in my proposal, should submit an individual application to Your Honor by the same date – September 15. Of course, I am hopeful that such applications will honor brevity and be as streamlined as possible. If this proposal is acceptable to the Court, please So Order this letter or have your chamber's let me know the best way to proceed.

Thank you for your attention to this matter. If the Court has any questions we are, of course, available at your convenience.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO

/s/ James E. Cecchi

JAMES E. CECCHI

cc: All Counsel (via ECF)